

EXHIBIT 6

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SCOTT EASOM, ADRIAN HOWARD, §
and JOHN NAU, on behalf of §
themselves and on behalf of §
all others similarly §
situated, §

Plaintiffs, §

V. §

US WELL SERVICES, LLC §

Defendant. §

CIVIL ACTION NO. 4:20-CV-02995

ORAL DEPOSITION OF
JOSH SHAPIRO, AS CORPORATE REPRESENTATIVE
OF U.S. WELL SERVICES, LLC
JANUARY 9, 2023

Page 98

Page 100

1 Go ahead.

2 A No. He was -- I mean, he was a corporate
3 employee, but he was based out of the Pittsburgh area.

4 Q (By Mr. Assaad) Okay. And what was his
5 title again, chief operations officer?

6 A Yeah.

7 Q Okay. COO?

8 A Yeah.

9 Q Then he was terminated in March, correct,
10 2020?

11 A That's correct.

12 Q So -- so with respect to the cancellation of
13 work by the oil companies, who would be the person
14 that obtained all that information and determined crew
15 sizes as well as where the crew was going to work?

16 MR. KORN: Object to the form; compound
17 question.

18 Q (By Mr. Assaad) Do you understand my
19 question?

20 A No, I don't.

21 Q Okay. Is there someone -- did Nathan
22 Houston -- or at the time whoever the COO was at the
23 time, were they responsible for communicating with the
24 oil companies to determine the available work?

25 A He was probably -- he was involved in

1 Lew, West Virginia; Pleasanton, Texas; and San Angelo,
2 Texas.

3 Q So three districts?

4 A Yeah. Three -- three major districts. We
5 may have had smaller kind of yards and so forth.

6 Q Satellites?

7 A Yeah. But -- as I think about it, and as we
8 kind of use the term colloquially, it's three.

9 Q Okay. So the three districts are San Angelo,
10 correct?

11 A Yeah.

12 Q Pleasanton?

13 A Yeah.

14 Q And Jane Lew, correct?

15 A Yeah.

16 Q And the district manager of each of them
17 would handle the day-to-day operations of those
18 districts?

19 A Yes. Or delegate responsibility.

20 Q Okay. Or delegate the responsibility?

21 A Yeah.

22 Q What were the -- what was the role of
23 district manager?

24 MR. KORN: And after you answer this
25 question, I need to use a bathroom break.

Page 99

Page 101

1 conversations like that, but that's the primary
2 responsibility of the commercial team, the salespeople
3 covering those accounts, and our chief commercial
4 officer.

5 Q With respect to manpower for each of the
6 different projects or wells --

7 A It's not something that we -- in most cases
8 the customer specifies how many -- how many workers
9 they require on each. It's kind of, you know, in
10 MSAs, and so they'll say we need one super -- service
11 supervisor of one fleet -- so they kind of set
12 headcount.

13 Q Okay.

14 A You're responding to the customer's
15 requirements.

16 Q And who assigns -- who assigns the workers?
17 That's something Nathan Houston would do or the COO?

18 A No. That's -- that's done further
19 downstream, you know, district manager and field
20 supervisor level.

21 Q And how many district managers were there in
22 2020?

23 A One for each district.

24 Q How many districts were there?

25 A Off the top of my head, working out of Jane

1 A District manager is ensuring that operations
2 are moving smoothly, that, you know, maintenance is
3 coordinated, that we're -- you know, they're
4 responsive to customer's needs, that all the fleets
5 are -- I mean, they do hiring and firing. You know,
6 in normal course -- I -- I don't know --

7 Q (By Mr. Assaad) So they --

8 A -- I'm not in operations. I can't tell
9 you.

10 MR. ASSAAD: Can I just finish this --

11 MR. KORN: No. I've got to use the
12 bathroom pretty bad. We'll deal with it afterwards.
13 You've got plenty of time. You've got the whole day
14 if you need it.

15 MR. ASSAAD: All right.

16 (Break.)

17 Q (By Mr. Assaad) Is there someone in
18 corporate that keeps track of the flow of work during
19 this March twenty -- March 2020 time period of what
20 wells were -- were the crews being released from or
21 not?

22 A Being released -- no, not really like a
23 central repository of that, however, there's a, you
24 know, daily update that goes around every day saying
25 what fleets per -- what the fleets were doing in the